

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SCOTT D.H. REDMAN, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	No. 13 C 3810
)	
v.)	Judge Ellis
)	
CITY OF CHICAGO,)	Magistrate Valdez
)	
Defendant.)	

STIPULATION

Plaintiff Scott D.H. Redman (“Plaintiff”) and Defendant City of Chicago (“Defendant”),
by their respective counsel, stipulate as follows:

1. In light of the Seventh Circuit’s decision in *Damasco v. Clearwire Corp.*, 662 F.3d 891 (7th Cir. 2011), Plaintiff filed his Motion for Class Certification [DE 4] contemporaneously with his Class Action Complaint [DE 1] to preclude having his class claims mooted by an individual settlement offer.

2. At the Court’s request, and so that Plaintiff’s Motion for Class Certification is not pending for an extended period of time, the parties stipulate as set forth herein.

3. Upon execution and filing of this Stipulation, the Court shall dismiss without prejudice Plaintiff’s Motion for Class Certification [DE 4].

4. From the time that the Court dismisses Plaintiff’s Motion for Class Certification [DE 4] until such time as Plaintiff files a renewed or amended motion for class certification, Defendant agrees not to make any individual offer to Plaintiff without Plaintiff’s prior consent.

SCOTT D.H. REDMAN, Plaintiff

CITY OF CHICAGO , Defendant,

By: /s Paul F. Markoff
Plaintiff's Attorney

By: s/ Isaac J. Colunga
Defendant's Attorney

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CERTIFICATE OF SERVICE

I certify that I served a copy of this *Stipulation* on the following electronically by using the CM/ECF system on this 20th day of November, 2013:

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